



U.S. Department of Justice

Rachael S. Rollins

United States Attorney

District of Massachusetts

Main Reception: (617) 748-3100

*John Joseph Moakley United States Courthouse
1 Courthouse Way
Suite 9200
Boston, Massachusetts 02210*

August 3, 2022

BY E-MAIL: melkins@marissaelkinslaw.com

Marissa Elkins, Esq.
Elkins, Auer, Rudof & Schiff
31 Trumbull Road, Suite B
Northampton, MA 01060

Re: United States v. Jeremy David Hanson
Criminal No. 22-CR-30013-MGM

Dear Counsel:

The United States Attorney for the District of Massachusetts (the "U.S. Attorney") and the United States Attorney for the Eastern District of Texas (the "E.D. Texas U.S. Attorney") and your client, Jeremy David Hanson ("Defendant") (collectively, the "Parties"), agree as follows, pursuant to Federal Rule of Criminal Procedure 11(c)(1)(B):

1. Change of Plea

No later than September 8, 2022 or as soon as practicable, Defendant will plead guilty to the following:

- a. Count One of the above-captioned Indictment (Interstate Transmission Of Threatening Communications, 18 U.S.C. § 875(c)) and the associated Special Finding (Selection Of Object Of The Offense Because Of The Gender, Gender Identity, Or Sexual Orientation Of Any Person, U.S.S.G. § 3A1.1(a)).
- b. Count One of the Indictment in *United States v. Jeremy David Hanson*, Docket No. 22-CR-00114-SDJ-CAN (Eastern District of Texas) (D.6) (Interstate Transmission Of

Threatening Communications, 18 U.S.C. § 875(c)).¹

Defendant admits that Defendant committed the crimes specified in these Indictments and is in fact guilty of them.

Defendant agrees that the attached Statement of Facts is true and accurate, and that he committed the conduct specified in it.

2. Penalties

Defendant faces the following maximum penalties on each count of the two Indictments: incarceration for five years; supervised release for three years; a fine of \$250,000; a mandatory special assessment of \$100; restitution; and forfeiture to the extent charged in the Indictment.

3. Sentencing Guidelines

The U.S. Attorney and the E.D. Texas U.S. Attorney agree, based on the following calculations, that Defendant's total "offense level" under the Guidelines is 18:

- a) Defendant's base offense level is 12 because Defendant was convicted of a violation of 18 U.S.C. § 875(c) (USSG §2A6.1(a)(1));
- b) Defendant's offense level is increased by 2 because Defendant's offense involved more than two threats (USSG §2A6.1(b)(2)(A)); and
- c) Defendant's offense level is increased by 4 because Defendant's offense resulted in substantial disruption of business functions or services (USSG §2A6.1(b)(4));
- d) Defendant's offense level is increased by 3 because Defendant intentionally selected any victim or any property as the object of the offense of conviction because of the actual or perceived race, color, religion, national origin, ethnicity, gender, gender identity, disability, or sexual orientation of any person (USSG §3A1.1(a));
- e) Defendant's offense level is decreased by 3 because Defendant has accepted responsibility for Defendant's crime (USSG § 3E1.1).

Defendant agrees with this Guidelines calculation except the three-level increase pursuant to USSG § 3A1.1(a), which Defendant reserves the right to contest at sentencing.

Defendant understands that the Court is not required to follow this calculation or even to

¹ As soon as practicable, Defendant agrees, pursuant to Fed. R. Crim. Pro. 20, to consent to transfer this case from the Eastern District of Texas to the District of Massachusetts for plea and sentencing.

sentence Defendant within the Guidelines and that Defendant may not withdraw Defendant's guilty plea if Defendant disagrees with how the Court calculates the Guidelines or with the sentence the Court imposes.

Defendant also understands that the U.S. Attorney will object to any reduction in Defendant's sentence based on acceptance of responsibility if: (a) at sentencing, Defendant (directly or through counsel) indicates that Defendant does not fully accept responsibility for having engaged in the conduct underlying each of the elements of the crimes to which Defendant is pleading guilty; or (b) by the time of sentencing, Defendant has committed a new federal or state offense, or has in any way obstructed justice.

If, after signing this Agreement, Defendant's criminal history score or Criminal History Category is reduced, the U.S. Attorney reserves the right to seek an upward departure under the Guidelines.

Nothing in this Plea Agreement affects the U.S. Attorney's obligation to provide the Court and the U.S. Probation Office with accurate and complete information regarding this case.

4. Sentence Recommendation

The U.S. Attorney agrees to recommend the following sentence to the Court:

- a) incarceration within the Guidelines sentencing range as calculated by the Parties in Paragraph 3;
- b) a fine within the Guidelines sentencing range as calculated by the Parties in Paragraph 3, unless the Court finds that Defendant is not able, and is not likely to become able, to pay a fine;
- c) 360 months of supervised release, with the special condition that Defendant have no contact with any of the individual or entity victims described in the Statement of Facts;
- d) a mandatory special assessment of \$200, which Defendant must pay to the Clerk of the Court by the date of sentencing;
- e) restitution in the amount requested by Merriam Webster, Inc.; and
- f) forfeiture as set forth in Paragraph 6.

Defendant reserves the right to request a restitution hearing.

The Parties agree that as a special condition of supervised release, Defendant shall have no contact, direct or indirect, personal or electronic, with any of the individual or entity victims identified in the Statement of Facts.

5. Waiver of Appellate Rights and Challenges to Conviction or Sentence

Defendant has the right to challenge Defendant's conviction and sentence on "direct appeal." This means that Defendant has the right to ask a higher court (the "appeals court") to look at what happened in this case and, if the appeals court finds that the trial court or the Parties made certain mistakes, overturn Defendant's conviction or sentence. Also, in some instances, Defendant has the right to file a separate civil lawsuit claiming that serious mistakes were made in this case and that Defendant's conviction or sentence should be overturned.

Defendant understands that Defendant has these rights, but now agrees to give them up. Specifically, Defendant agrees that:

- a) Defendant will not challenge Defendant's conviction on direct appeal or in any other proceeding, including in a separate civil lawsuit; and
- b) Defendant will not challenge any prison sentence of 24 months or less or any court orders relating to forfeiture, restitution, fines or supervised release. This provision is binding even if the Court's Guidelines analysis is different than the one in this Agreement.

Defendant understands that, by agreeing to the above, Defendant is agreeing that Defendant's conviction and sentence (to the extent set forth in subparagraph (b), above) will be final when the Court issues a written judgment after the sentencing hearing in this case. That is, after the Court issues a written judgment, Defendant will lose the right to appeal or otherwise challenge Defendant's conviction and sentence (to the extent set forth in subparagraph (b), above), regardless of whether Defendant later changes Defendant's mind or finds new information that would have led Defendant not to agree to give up these rights in the first place.

Defendant is agreeing to give up these rights at least partly in exchange for concessions the U.S. Attorney is making in this Agreement.

The Parties agree that, despite giving up these rights, Defendant keeps the right to later claim that Defendant's lawyer rendered ineffective assistance of counsel, or that the prosecutor or a member of law enforcement involved in the case engaged in misconduct serious enough to entitle Defendant to have Defendant's conviction or sentence overturned.

6. Forfeiture

Defendant hereby waives and releases any claims Defendant may have to any vehicles, currency, or other personal property seized by the United States, or seized by any state or local law enforcement agency and turned over to the United States, during the investigation and prosecution of this case, and consents to the forfeiture of all such assets.

7. Civil Liability

This Plea Agreement does not affect any civil liability, including any tax liability, Defendant has incurred or may later incur due to Defendant's criminal conduct and guilty plea to the charges specified in Paragraph 1 of this Agreement.

8. Breach of Plea Agreement

Defendant understands that if Defendant breaches any provision of this Agreement, violates any condition of Defendant's pre-trial release or commits any crime following Defendant's execution of this Plea Agreement, Defendant cannot rely upon such conduct to withdraw Defendant's guilty plea. Defendant's conduct, however, would give the U.S. Attorney the right to be released from the U.S. Attorney's commitments under this Agreement, to pursue any charges that were, or are to be, dismissed under this Agreement, and to use against Defendant any of Defendant's statements, and any information or materials Defendant provided to the U.S. Attorney during investigation or prosecution of Defendant's case—even if the Parties had entered any earlier written or oral agreements or understandings about this issue.

Defendant also understands that if Defendant breaches any provision of this Agreement or engages in any of the aforementioned conduct, Defendant thereby waives any defenses based on the statute of limitations, constitutional protections against pre-indictment delay, and the Speedy Trial Act, that Defendant otherwise may have had to any charges based on conduct occurring before the date of this Agreement.

9. Who is Bound by Plea Agreement

This Agreement is only between Defendant and the U.S. Attorneys for the District of Massachusetts and the Eastern District of Texas. It does not bind the Attorney General of the United States or any other federal, state, or local prosecuting authorities.

10. Modifications to Plea Agreement

This Agreement can be modified or supplemented only in a written memorandum signed by both Parties, or through proceedings in open court.


* * *

If this letter accurately reflects the agreement between the U.S. Attorney and Defendant, please have Defendant sign the Acknowledgment of Plea Agreement below. Please also sign below as Witness. Return the original of this letter to Assistant U.S. Attorney Steven H. Breslow.

Sincerely,

RACHAEL S. ROLLINS
United States Attorney


JDH (Aug 18, 2022 14:09 PDT)


By: **DEEPIKA SHUKLA**  Digitally signed by DEEPIKA SHUKLA
Date: 2022.08.16 13:52:13 -04'00'

DEEPIKA SHUKLA
Chief, Springfield Branch Office

STEVEN BRESLOW  Digitally signed by STEVEN BRESLOW
Date: 2022.08.16 20:04:49 -04'00'

STEVEN H. BRESLOW
Assistant U.S. Attorney

BRIT FEATHERSTON
United States Attorney
Eastern District of Texas

By: **TRACEY BATSON**  Digitally signed by TRACEY BATSON
Date: 2022.08.18 12:25:58 -05'00'

TRACEY BATSON
Assistant United States Attorney

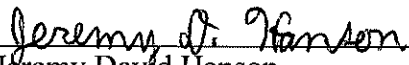
ACKNOWLEDGMENT OF PLEA AGREEMENT

I have read this letter and discussed it with my attorney. The letter accurately presents my agreement with the United States Attorney's Office for the District of Massachusetts. There are no unwritten agreements between me and the United States Attorney's Office, and no United States government official has made any unwritten promises or representations to me in connection with my guilty plea. I have received no prior offers to resolve this case.

I understand the crime I am pleading guilty to, and the maximum penalties for that crime. I have discussed the Sentencing Guidelines with my lawyer, and I understand the sentencing ranges that may apply.

I am satisfied with the legal representation my lawyer has given me, and we have had enough time to meet and discuss my case. We have discussed the charges against me, possible defenses I might have, the terms of this Agreement and whether I should go to trial.

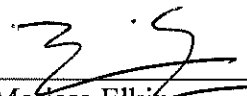
I am entering into this Agreement freely and voluntarily and because I am in fact guilty of the offenses. I believe this Agreement is in my best interest.



Jeremy David Hanson
Defendant

Date: 8/9/22

I certify that Jeremy David Hanson has read this Agreement and that we have discussed what it means. I believe Jeremy David Hanson understands the Agreement and is entering into it freely, voluntarily, and knowingly. I also certify that the U.S. Attorney has not extended any other offers regarding a change of plea in this case.



Marissa Elkins
Attorney for Defendant

Date: 8/15/22

Statement of Facts

United States v. Jeremy David Hanson
Criminal No. 22-CR-30013-MGM

1. Introduction

As set forth below, from approximately October 23, 2014 to March 21, 2022, Defendant Jeremy David Hanson (“Hanson”) transmitted in interstate commerce various threatening communications to various individuals and entities. Hanson frequently selected the object of his threatening communications because of the gender, gender identity, and/or sexual orientation of various persons. Hanson used various facilities of interstate commerce to communicate these threats, including e-mail, text message, web posting, and telephone calls. Hanson continued this course of conduct in spite of repeated interactions with law enforcement officers who directed him to cease his threatening communications.

2. Hanson’s Threats To Merriam-Webster, Inc. (“Merriam-Webster”)

a. Merriam-Webster

Merriam-Webster is America's foremost publisher of language-related reference works, including its award-winning dictionary site at www.Merriam-Webster.com. Merriam-Webster regularly updates and revises its online and print dictionaries, and solicits public input concerning these and other language resources. Merriam-Webster maintains its headquarters in Springfield, MA and additional offices in New York, NY.

Merriam-Webster’s website contains a “Contact Us” page in which individuals can submit communications online. Merriam-Webster’s online dictionary also contains engagement features specifically designed for the digital user, including a feature that permits users to comment on the dictionary’s content and word choices.

b. Hanson's Communications To Merriam-Webster

On October 2, 2021, at 12:44 a.m. Hanson posted the following communication on the comments section for the Merriam-Webster dictionary webpages corresponding to the word "Female" at <https://www.merriam-webster.com/dictionary/female>:

It is absolutely sickening that Merriam-Webster now tells blatant lies and promotes anti-science propaganda. There is no such thing as "gender identity." The imbecile who wrote this entry should be hunted down and shot.

On October 2, 2021 at 12:55 a.m., Hanson posted the following communication on Merriam-Webster's its "Contact Us" page:

You [sic] headquarters should be shot up and bombed. It is sickening that you have caved to the cultural Marxist, anti-science tranny agenda and altered the definition of "female" as part of the Left's efforts to corrupt and degrade the English language and deny reality. You evil Marxists should all be killed. It would be poetic justice to have someone storm your offices and shoot up the place, leaving none of you commies alive.

On October 8, 2021, at 11:17 a.m., Hanson posted the following communication on the comments section for the Merriam-Webster dictionary webpages corresponding to the word "Girl" at <https://www.merriam-webster.com/dictionary/girl>:

The moron who created this fake definition should be hunted down and shot. I am sick and tired of these cultural Marxists denying

science and destroying the English Language. Merriam-Webster

headquarters should be shot up and bombed. Boys aren't girls.

On October 8, 2021, at 11:25 a.m., Hanson posted the following communication on Merriam-Webster's "Contact Us" page:

I am going to shoot up and bomb your offices for lying and creating

fake definitions in order to pander to the tranny mafia. Boys aren't

girls, and girls aren't boys. The only good Marxist is a dead Marxist.

I will assassinate your top editor. You sickening, vile tranny freaks.

3. Hanson's E-Mails To An Irish Politician And Wikipedia

On October 23, 2014, Hanson sent an e-mail to Irish politician Averil Power that stated, among other things: "Hope you enjoy getting raped by savage Muslims when Ireland falls to *sharia* law."

On June 1, 2015, Hanson sent the following e-mail to Wikipedia: "I will blow up Wikipedia in San Francisco. I will hunt down the anti-Semites Smalljim and Jason R. Remy and kill them. I will rape the anti-Semitic freak's daughter."

On July 27, 2015, FBI investigators interviewed Hanson in the presence of his mother, Lauren Zack ("Zack"), and a medical psychiatric resident at University of California – Irvine Medical Center, who had determined that Hanson was fit to be interviewed. Hanson repeatedly expressed remorse for making these and other threatening communications, and he promised to refrain from sending any threatening remarks by social media or online in the future.

4. Hanson's Threat To The American Civil Liberties Union ("ACLU")

On April 19, 2020, the ACLU posted a message related to absentee ballots and a lawsuit in Missouri. In response to this post, Hanson posted a response to the ACLU from his Instagram

account, @quinsareth1, that stated, “The ACLU is a shameless partisan hack that hates freedom, hates America. I’d like to go on a shooting spree in their offices.”

5. Hanson’s Threats to Land O’ Lakes (“LO’L”)

On April 26, 2020, Hanson sent the following threatening communications from his @quinsareth1 Instagram account to LO’L:

- a. 9:44 p.m.: “Land O Lakes headquarters deserve to be shot up and bombed for turning into a cultural Marxist company that panders to political correctness.”
- b. 9:46 p.m.: “@landolakesstchn Land O Lakes headquarters deserve to be shot up and bombed for turning into a cultural Marxist company that panders to political correctness.

4. Hanson’s Threats To A New York City Rabbi

On July 12, 2020, Hanson sent threatening e-mails from Jeremydhanson@outlook.com to a rabbi in New York City. The email subject line read: “You’re not Jewish. You’re some deranged Marxist Faggot. You deserve a bullet in the head.” The email body read:

I’d like nothing more than to fill you full of lead. You’re a sickening kapo and a disgusting faggot. You state your “pronouns” in your Twitter profile. That identifies you as some kind of tranny abomination and a radical Marxist. Your Marxism negates your Judaism, as Marxism is an anti-Semitic ideology. In short, you are pure evil, a aubhuman [sic] traitorous cockroach even more evil than the Nazis. You and your entire family should be gassed and your synagogue shot up and bombed.

5. Hanson's Threats To Sleeping Giants Founders

On January 15, 2021, Hanson used Twitter account @big_destroy to post the following threatening communications:

- a. "We need an armed invasion of all Big Tech headquarters. Myself, I plan on taking out [NJ] and [MR]." The comment was followed by a gun emoji.
- b. "Google, Apple, and Amazon should have their headquarters bombed. Also looking into the people behind the anti-free speech 'Sleeping Giants'² Twitter account – [NJ] and [MR]. They need a few bullets to the head."

6. Hanson's Threats To Hasbro Toys ("Hasbro")

On February 25, 2021, Hanson sent the following threatening messages received to Hasbro Pulse, a system used by Hasbro to communicate with the public. Each of these messages were signed "Jeremy Hanson" and the email account listed as the sending address was Jeremydhanson@outlook.com.

- a. 6:14 p.m. EST: "I am going to shoot up and bomb your headquarters for pandering to the tranny freaks. Mr. Potato head is male. You sickening tranny cultural narcissist need to be exterminated. Death to tranny [sic]."
- b. 7:51 p.m.: This threat provided identical language with the addition of "only figuratively."

On March 4, 2021, FBI agents interviewed both Hanson and Zack concerning the threats to Hasbro. Hanson stated:

² According to its Twitter account, Sleeping Giants is a "campaign for media, advertising and social platform accountability." https://twitter.com/slpng_giants?lang=en.

a. He sent both threatening communications, but he did not intend to carry out the threat, and he sent the second “only figuratively” communication after realizing he had done something wrong.

b. He had difficulty controlling what he posted online when he became “angry,” and he posted online to express the “rage” he felt.

c. He understood there was a difference between expressing himself and threatening someone, agreed he would have to find a different outlet for his feelings when he got angry about something he saw in the news, and expressed remorse that law enforcement had to get involved.

6. Hanson’s Threat To The Entomological Society of America (“ESA”)

On July 10, 2021, Hanson posted the following threat to the ESA on its website using the e-mail address death2marxists@gmail.com. The subject line stated: “‘Gypsy’ is not a slur, nor is it offensive.” The message stated: “Shame on you for caving to the radical Left’s agenda to corrupt and destroy the English language. You cultural Marxist snowflakes should be hunted down and shot. Democrat trash.”

7. Hanson’s Threats To A Madison, Wisconsin Alderperson

On August 8, 2021, Hanson sent the following e-mail to an Alderperson in Madison, WI, based upon the Alderperson’s role in the removal of a rock monument.³ The email was entitled “Rocks aren’t racist, you stupid nigger” and the communication read:

Hey, you dumb nigger, you should be lynched. Stupid Marxist cunt.

³ On August 6, 2021, the University of Wisconsin–Madison moved a monument named Chamberlin Rock, “an object that had become a painful symbol of racism to generations of students,” to a site off the main campus. <https://news.wisc.edu/no-longer-a-memorial-rock-removed-from-campus/>.

You're so retarded you actually believe two billion year old boulders are racist. Insane Marxists like you are destroying America. You stupid, crazed bitch, you deserve to be raped and lynched for tearing out that boulder.

On November 22, 2021, Madison (WI) Police Department investigators spoke to Zack, who indicated that she remembered Hanson mentioning being upset about the monument. Zack offered to speak to Hanson about the email and see if Hanson wanted to speak to investigators, but Hanson declined to be interviewed by the MPD.

7. Hanson's Threats To IGN Entertainment ("IGNE") and DC Comics

On October 12, 2021, Hanson sent the following communications to IGNE, a video game and entertainment media publication company, in response to an IGNE Instagram post stating "Exclusive: DC's New Superman Jon Kent Comes Out as Bisexual":

- a. "I am going to shoot up and bomb your headquarters for discriminating against conservatives and silencing conservative speech. The only good Democrat is a dead Democrat. I will kill you all for discriminating against and silencing me for criticizing the radical homosexual agenda."
- b. "I will Kill you for censoring me, and I will shoot up IGN headquarters."
- c. "All Faggots Hate Free Speech, so they should all Be Killed."
- d. "All Fags Need to be rounded up and gassed."
- e. "The only good faggot is a dead one."
- f. "I am going to shoot up the IGN offices for discriminating against and silencing conservatives. The Marxist oppression against Americans needs to end now."

- g. “I am going to shoot up the IGN offices for discrimination against and silencing conservatives.”
- h. “Of course someone like you (read: radical Democrat anti-American traitor) doesn’t have a problem with innocent children being corrupted by degenerate filth in the form of a villain being disguised as a ‘superhero’ IGN is obviously a far-left extremist, cultural Marxist propaganda site that discriminates against conservatives and hates free speech. I will have to keep posting my comment, and if IGN keeps deleting it, I will shoot up their offices. The radical left needs to pay for silencing and oppressing conservatives.”

On October 16, 2021, Hanson sent the following Facebook Messenger communications to a writer for DC Comics:

- a. “I am going to fucking kill you. I am going to rape your wife and decapitate her then blow up DC Comics headquarters.”
- b. “We are going to have a civil war and EXTERMINATE you cultural Marxists destroying America. TRUMP 2024”
- c. “I WILL BURN YOU ALIVE AND DECAPITATE YOU FOR MAKING SUPERMAN GAY. FUCKING FAGGOT”
- d. “I WILL FUCKING BOMN DC COMICS HEADWUARTERS [sic] AND ASSINATE [sic] THEIR CEO. FUCKING COMMIE FAGGOT TRASH.”

On January 16, 2021, Hanson sent an additional threat to several DC Comics email addresses. The sending account was listed as ShootUpandBombDCComics@gmx.us. The subject line read: “I am going to shoot up and bomb your offices for ruining Superman.” The body of the

email read: “First, you turn him into a faggot. Now, you make him anti-American. You fucking Marxist pieces of shit. I will make you pay. I will kill [Comic Publisher 1] and rape and murder his wife.”

On October 27, 2021, FBI agents interviewed Hanson in the company of Zack. Hanson stated:

- a. He suffers from obsessive-compulsive disorder, Aspergers, anxiety, and depression, and he struggles with impulse control.
- b. He recently made threatening remarks online regarding the sexual orientation of Superman to DC Comics as well as IGN Entertainment.
- c. He understands the threatening remarks he makes online are illegal, but is unable to control himself or his emotions.
- d. He is usually able to vent his anger to his mother. However, after his mother has gone to bed, Hanson makes comments online without the added benefit of his mother as a filter or sounding board.

8. Hanson’s Threats To Loyola Marymount University (“LMU”) Professors

On January 6, 2022, Hanson sent two LMU professors (Professor 1 and Professor 2) the following threatening e-mails.

The email sent to Professor 1 read:

You should be fired, you stupid cunt. You actually penalized a student for using CORRECT grammar! What would you have him do, nonsensically refer to God as a plural in the manner of mentally-ill tranny freaks who don’t understand basic English? You radical leftists who are trying to destroy the English language and destroy

society are [sic] sickening and pure evil. You are a malignant tumor, a cancer eating away at our civilization. The only cure for your intolerant, abominable totalitarian lunacy is a bullet to the brain. Please do the world a favor and kill yourself, you crazed feminazi bitch.

The email to Professor 2 read:

Death to tranny freaks | Go back to India, you tranny faggot. You freaks aren't welcome here. Gas all Marxists and LGBTs | I am going to kill you. I shall decapitate you then set your classroom on fire. Evil commie subhuman faggot. You had best be ready to die for forcing your deranged tranny ideology on normal people. The only good tranny is a dead tranny. There are only two genders, and it's not possible to switch genders. Transgenderism is a mental disorder. Facts don't care about your feelings, you retarded, subhuman faggot. We will soon round up and gas you totalitarian Marxist freaks who are destroying America.

9. Hanson's Threat To New York City's Mayor and City Council

On January 15, 2022, Hanson sent an e-mail from Death2AllMarxists@usa.com to the Office of Correspondence for Mayor Eric Adams, who is Black: "The radical Marxist nigger mayor should be assassinated for destroying our democracy and allowing non-Americans to vote. NYC council ought to be shot up and bombed. You are all un-American traitors."

10. Hanson's Threats to Amnesty International USA ("Amnesty")

On February 11, 2022, Hanson sent the following two e-mails to Amnesty employees.

The first threatening email was sent by Death2antisemites@mail.com. The subject of the email read: “Your offices deserve to be shot up and bombed.” The text of the email read:

You all deserve to die for your anti-Semitic lies about Israel. I will personally be traveling to your leader’s house and will assassinate the vile Marxist. You leftists are horrific anti-Semites. You deserve to be slowly tortured to death, cut open and eviscerated, and strangled with your own intestines. You are a racist, Marxist, Islamic supremacist organization that needs to be destroyed. It’s time for you hypocritical leftist anti-Semites [sic] to learn that your actions have consequences. We jews are tired of being lied to and being used as the world’s punching bag.

The second threatening e-mail was sent later in the day to the same Amnesty employees from Death2antisemites@gmail.com. The email read:

Once the COVID pandemic is over and you anti-Semites have returned to your offices, I am going to shoot your main office up. Yes, I have a firearm. The only good anti-Semite is a dead anti-Semite.

11. Hanson’s Threat To California Governor Gavin Newsom And Office Workers

On March 2, 2022, Hanson sent the following e-mail from DestroyWorkerCorporations@mail.com to a public e-mail address used by the California Department of Public Health: “Anyone who promotes the degenerate and horrific tranny agenda is a traitor who needs to be killed. I will personally kill you and shoot up your offices then assassinate Gavin Newsom.”

12. Hanson's Threat To The President Of University of North Texas ("UNT")

On March 3, 2022, Hanson sent the following threatening email from Killallmarxisttrannyteachers@usa.com to the President of UNT. The title of the email read: "You ought to be shot in the head and have your offices set on fire for supporting child genital mutilation and transgenderism."

The body of the email read: "YOU LEFTIST FREAKS are the intolerant ones. Trannies are disgusting PERVERTS. Every single tranny freak should be gassed, along with their supporters. I will personally go to your university and start executing tyrannical leftist students and faculty who oppress conservatives. The only good Democrat is a dead Democrat."

13. Hanson's Threats To Walt Disney Co. ("Disney")

On March 10-11, 2022, Hanson sent the following two e-mails to Disney's Chief Executive Officer ("CEO"):

- a. March 10, 2022: An e-mail from DestroyWokeCorporations@mail.com with the subject line "I am going to assassinate you and shoot up your corporate headquarters for promoting the horrific transgender ideology to children." The body of the email read: "You Marxist corporatists are the enemies of America. You are controlled by the Democrats and the tranny mafia, and I will kill you and your entire family for promoting transgender child abuse. I know where you live, you evil sack of shit."
- b. March 11, 2022: An e-mail from DestroyWokeCorporations@usa.com with the subject line: "I am going to shoot up and bomb your headquarters for being a bunch of pedophile faggots who foist transgender ideology onto children." The body of the email read: "You are a sickening, spineless

woke corporation, and you all deserve to die. The only way to stop the destruction of America by woke corporations is through terrorism.”

On March 16, 2022, Hanson called in the following bomb threat to Disney: “Hey, I just learned that your company supports the transgender agenda and wants to brainwash children with gender ideology. So, just to let you know, I’ve left multiple pipe bombs at your corporate headquarters. See ya.”

14. Hanson’s Threat To USA Today and the United States Department of Health and Human Services (“HHS”)

On March 18, 2022, Hanson sent the following communication to USA Today via Formstack from the user name “Death to Leftist Journalists” who provided the email address DestroyWokeCorporation@usa.com. The communication read: “I am going to shoot up and bomb your offices for being a lying fake news rag that declared a man ‘woman of the year.’ Then, I will assassinate that freak Richard Levine and blow up the HHS.”⁴

15. The Eau Claire (Wisconsin) Area School Board Threat

On March 21, 2022, Hanson posted the following threat against the school board of the Eau Claire (Wisconsin) Area School District on its website. The contact’s name listed on the contact form was “Kill All Marxist Teachers.” The email listed on the contact form was Death2Marxists@gmail.com. The message stated: “I am going to kill you and shoot up your next school-board meeting for promoting the horrific, radical transgender agenda. It’s now time to declare war on you pedos [sic]. I am going to kill you and your entire family.”

⁴ USA Today recently named Rachel Lavine, a transgender woman who is an Assistant Secretary of Health and Human Services for the Biden Administration, as one of its Women of the Year. Richard Lavine was the name used by Rachel Lavine prior to Lavine’s gender transition.

Elkins, Marissa.Rule 11(c)(1)(B) plea agreement.Hanson, Jeremy.FINAL.08-03-22

Final Audit Report

2022-08-18

Created:	2022-08-18
By:	Marissa Elkins (melkins@elkinslawllc.com)
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